

MELINDA L. HAAG, CSBN 132612
United States Attorney
DONNA L. CALVERT
Acting Regional Chief Counsel, Region IX
Social Security Administration
LYNN M. HARADA, CSBN 267616
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (415) 977-8977
Facsimile: (415) 744-0134
E-Mail: Lynn.Harada@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ILDA KALANI,)	Case No.: 3:13-cv-04591-JST
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME
vs.)	
CAROLYN W. COLVIN,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended by 30 days from April 2, 2014, until May 2, 2014. This is Defendant's first request for an extension of time to respond to Plaintiff's motion. Defense counsel needs the additional time to further review the file and prepare a response in this matter due to a heavy workload and pre-approved leave, despite due diligence.

1 The parties further stipulate that the remaining dates in the Court's Scheduling Order
2 shall be modified accordingly.

3 Defense counsel apologizes to the Court for any inconvenience caused by this delay.

4
5 Respectfully submitted,

6 Dated: March 25, 2014

/s/ Tom F. Weathered*

(*as authorized via email on 3/24/14)

7 TOM F. WEATHERED

8 Attorney for Plaintiff

9
10 Dated: March 25, 2014

MELINDA L. HAAG

11 United States Attorney

DONNA L. CALVERT

12 Acting Regional Chief Counsel, Region IX

13 Social Security Administration

14 By: /s/ Lynn M. Harada

15 LYNN M. HARADA

16 Special Assistant U.S. Attorney

17 Attorneys for Defendant

18
19
20 APPROVED AND SO ORDERED:

21 Dated: March 25, 2014

22 ORDER

